

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
LUBBOCK DIVISION

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

2018 JUN 13 PM 1:54

JB

DEPUTY CLERK

5-18CR0055-C

UNITED STATES OF AMERICA

v.

No. _____

DUSTIN RAY LEONARD

INDICTMENT

The Grand Jury Charges:

Count One
Enticement of a Minor
(Violation of 18 U.S.C. § 2422(b))

In or about May 2018, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Dustin Ray Leonard**, defendant, did knowingly use a facility and means of interstate and foreign commerce, to persuade, induce, and entice, and attempt to persuade, induce, and entice, "Jane Doe," an individual who had not attained the age of eighteen (18) years, to engage in sexual activity for which Leonard could be charged with a criminal offense, that is, a violation of Section 21.12 of the Texas Penal Code, which makes it a crime for any employee of a public or private primary or secondary school to engage in sexual contact, sexual intercourse, or deviate sexual intercourse with a person who is enrolled in a public or private primary or secondary school at which the employee works.

In violation of Title 18, United States Code, Sections 2422(b) and 2.

Forfeiture Notice
(18 U.S.C. § 2428)

Upon conviction of the offense in Count One of the indictment, and pursuant to 18 U.S.C. § 2428(b), defendant **Dustin Ray Leonard** shall forfeit to the United States of America: (a) any property, real or personal, used or intended to be used to commit or to facilitate the commission of any violation of Chapter 117; and (b) any property, real or personal, that constitutes or is derived from proceeds traceable to any violation of Chapter 117. The above-referenced property subject to forfeiture includes, but is not limited to, the following: Samsung Galaxy S9+, Model Number SM-G965U, IMEI 356420090165085, Serial Number RF8K21EXADZ.

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

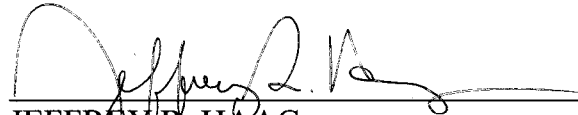
it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2428(a), to seek forfeiture of any other property of the said defendant up to the value of the forfeitable property described above.

A TRUE BILL:



FOREPERSON

ERIN NEALY COX
UNITED STATES ATTORNEY



JEFFREY R. HAAG
Assistant United States Attorney
West Texas Branch Chief
Texas State Bar No. 24027064
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
LUBBOCK DIVISION

THE UNITED STATES OF AMERICA

v.

DUSTIN RAY LEONARD

INDICTMENT

18 U.S.C. § 2422(b)
Enticement of a Minor
(One Count)

Notice of Forfeiture

(One count and forfeiture notice)

A true bill rendered,

Lubbock



Foreperson

Filed in open court this 13th day of June A.D. 2018.

Clerk

WARRANT TO ISSUE FOR DEFENDANT
Complaint #5:18-MJ-056 filed 05/25/18



UNITED STATES MAGISTRATE JUDGE